

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA

In re:)	Case No. 25-30002
)	(Chapter 11)
GENERATIONS ON 1ST, LLC)	
)	
Debtor)	
_____)	
)	
In re:)	Case No. 25-30003
)	(Chapter 11)
PARKSIDE PLACE, LLC)	
)	
Debtor)	(Jointly Administered)
_____)	
)	
In re:)	Case No. 25-30004
)	(Chapter 11)
THE RUINS, LLC)	
)	
Debtor)	
_____)	(Separately Administered)

STIPULATION RE SCOPE OF AUTOMATIC STAY

1. Generations on 1st, LLC (“Generations”), Parkside Place, LLC (“Parkside”), and The Ruins, LLC (“Ruins”) (collectively, the “Debtors,” and each a “Debtor”), and Red River State Bank (“RRSB”), have engaged in significant litigation to date and they wish to avoid the cost, risk, uncertainty, and delay of additional litigation, if possible.
2. Prior to the petition date, two separate foreclosure actions were commenced against a house located at 22587 Knollwood Lane, Pelican Rapids, MN 56572 (the “House”).
3. The House is owned by a non-debtor affiliate called Craig Holdings, LLC (“CHL”).
4. RRSB holds a first-position mortgage on the House in the original principal sum of \$2,000,000.00. Charles Aarestad and Randall Aarestad have second- and third-position mortgages, respectively.

5. CHL intends to exercise its right to redeem the House from the foreclosures under applicable non-bankruptcy law (such process, the “Redemption”).
6. Time is of the essence because the redemption period expires on June 12, 2025.
7. CHL must procure financing and title insurance from third parties to redeem. And in turn, such third parties have conditioned financing and title insurance upon assurances that the transaction does not violate the automatic stay in these cases.
8. CHL may rely upon the assets or creditworthiness of its sole member, Jesse Craig, or his spouse, Mulinda Craig (collectively, Jesse Craig and Mulinda Craig are the “Insiders.”) to obtain such financing. (Collectively, CHL and the Insiders are referred to hereinafter as the “Non-Debtor Entities”).
9. Although the House is not property of the estate, Debtors believe the Redemption is nonetheless in the best interest of the Debtors’ estates because if successful, it could indirectly reduce the pool of unsecured claims against one or more Debtors. Therefore, Debtors believe they have a fiduciary duty to facilitate the Redemption, if possible.
10. Moreover, it is not uncommon in Bankruptcy for parties to seek comfort orders regarding the scope of a debtor’s automatic stay, even if such relief may not be strictly necessary to avoid a stay violation. See 11 U.S.C. 362(j) and Fed. R. Bankr. P. 4001.

THEREFORE, Debtors have requested, and RRSB has agreed, to stipulate as follows:

- a. The House is not property of the estate under 11 U.S.C. 541.
- b. The automatic stay of 11 U.S.C. 362 in the above-captioned bankruptcy cases does not extend to the Non-Debtor Entities.
- c. The Redemption shall not constitute a violation of the automatic stay under 11 U.S.C. 362(c).
- d. RRSB and the Debtors have not stipulated nor taken any definitive position on whether the Insiders may have claims against any of the Debtors related to the Redemption. The parties reserve all rights with respect to the allowance or disallowance of such claims, if any.

VOGEL LAW FIRM

Dated: May 5, 2025

By: /s/ Kesha L. Tanabe (signed w/
express permission)
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THE DAKOTA BANKRUPTCY FIRM

Dated: May 5, 2025

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